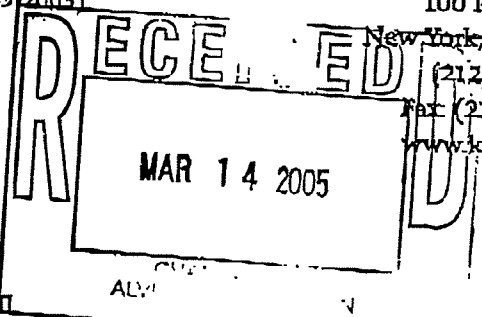




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March 14, 2005

BY HAND/VIA FACSIMILE

Desmond T. Barry, Jr., Esq.
Condon & Forsyth LLP
7 Times Square
New York, NY 10036

Re: 21 MC97: World Trade Center September 11, 2001 Litigation - Discovery

Dear Mr. Barry:

Further to our recent telephone conversation and one meeting with Judge Hellerstein last Friday, I am writing to confirm that counsel for the wrongful death/personal injury plaintiffs within 30 days will provide the defendants in 21 MC97, the following documents (to the extent available) in each wrongful death/personal injury case:

1. Income tax returns (at least 3 years);
2. birth certificates of decedents, survivors, and heirs;
3. marriage certificates;
4. death certificates;
5. decedent's education certificates and degrees;
6. employer provided benefits (including fringe benefits) documentation;
7. pension plan documentation;
8. medical examiner reports;
9. personal health/medical documentation;
10. divorce decrees, if any;

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11. documentation or narrative details concerning lost household services and other extraordinary circumstances;
12. any other materials or information counsel may want you to consider to fairly evaluate their case including the identity of the persons who are entitled to share any award, settlement or verdict; and
13. with respect to "ground victims", the best estimate of their location at the time of death.

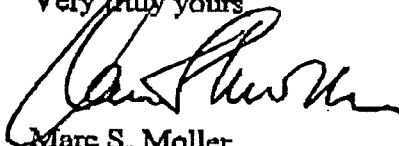
The documents will be sent to you for distribution to the persons on the defense side who must evaluate the materials.

Thereafter, within 45 days after plaintiffs' production of documents, it is agreed that defendants' representatives (i.e., their counsel and/or a representative of the insurers) will meet with each individual plaintiffs' attorney to make an offer or to discuss their respective positions with a view towards the prospect of settlement.

All of the materials and the discussions shall be held in strict confidence and will not be disclosed to any person or party without a true need to know. Before any disclosures are made, you agree to advise the plaintiff's lawyers whose case is involved of the persons to whom you propose to circulate the materials or discuss the case, but never to another plaintiffs' counsel without prior written consent from the plaintiff's counsel involved in the case.

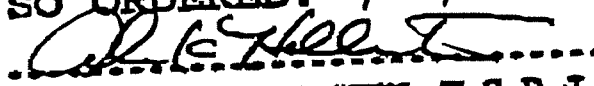
It is the express purpose of this process to initiate a productive dialogue with each attorney with wrongful death/personal injury cases in the hope that it will lead to early and fair resolution of these cases.

Very truly yours



Marc S. Moller
Plaintiffs' Liaison Counsel

MSM:cs

SO ORDERED: 3/14/05

 ALVIN K. HELLERSTEIN, U.S.D.J.

Desmond T. Barry, Jr., Esq.
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Page 2

cc: (Via Telecopier)
Honorable Alvin K. Hellerstein
WD/PI Plaintiffs' Executive Committee
All WD/PI Plaintiffs' Counsel
Richard Williamson, Esq.

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